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6 Attorney for Defendant
7 MARTIN CERVANTES VASQUEZ

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 MARTIN CERVANTES VASQUEZ,
15 Defendant

CASE NO. 2:20-CR-00193 DJC

**STIPULATION TO CONTINUE
SENTENCING HEARING; ORDER**

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17 Defendant MARTIN CERVANTES VASQUEZ, by and through his counsel of record, TONI
18 WHITE, and the GOVERNMENT, by and through Assistant United States Attorney DAVID
19 SPENCER hereby stipulate as follows:

- 20 1. By previous order, this matter was set for sentencing on April 24, 2025.
21 2. By this stipulation, defendant now moves to continue the sentencing to May 8, 2025,
22 at 9:00 AM. The GOVERNMENT does not oppose this request.
23 3. The presentence report has been completed and disclosed.
24 4. Mr. Cervantes Vasquez, through counsel, has provided multiple safety valve statements to
25 the Government in support of his request for safety valve consideration. The safety valve procedure
26 allows for the Government to request additional and/or follow-up information so that it can
27 determine whether it will agree that a defendant has met the prong of safety valve that requires his
28 statement.

1 5. The Government reviewed the most recent statement provided by Mr. Cervantes and asked
2 for additional follow-up. Counsel needs additional time to meet with Mr. Cervantes about the
3 follow-up request from the Government.

4 6. The probation officer, Sarah Brown, is available and is in agreement with the sentencing
5 date requested by the parties.

6 IT IS SO STIPULATED.

7 Dated: April 16, 2025

MICHELE BECKWITH
Acting United States Attorney

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9 By: /s/ Toni White for
DAVID SPENCER
Assistant U.S. Attorney

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11 For the United States

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13 Dated: April 16, 2025

By: /s/ Toni White
TONI WHITE
For Defendant Martin Cervantes Vasquez

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16
17 **ORDER**

18 IT IS SO FOUND AND ORDERED this 17th day of April, 2025.

19
20 /s/ Daniel J. Calabretta
21 THE HONORABLE DANIEL J. CALABRETTA
22 UNITED STATES DISTRICT JUDGE
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